

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,
MARY BLY, MICHAEL CONNELLY,
SYLVIA DAY, JONATHAN FRANZEN,
JOHN GRISHAM, ELIN HILDERBRAND,
CHRISTINA BAKER KLINE, MAYA
SHANBHAG LANG, VICTOR LAVALLE,
GEORGE R.R. MARTIN, JODI PICOULT,
DOUGLAS PRESTON, ROXANA
ROBINSON, GEORGE SAUNDERS,
SCOTT TUROW, and RACHEL VAIL,
individually and on behalf of
others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI OPCO LLC,
OPENAI GP LLC, OPENAI LLC, OPENAI
GLOBAL LLC, OAI CORPORATION LLC,
OPENAI HOLDINGS LLC, OPENAI
STARTUP FUND I LP, OPENAI STARTUP
FUND GP I LLC, OPENAI STARTUP
FUND MANAGEMENT LLC, and
MICROSOFT CORPORATION,

Defendants.

Case No. 1:23-cv-8292-SHS

NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for Southern and Eastern Districts of New York, Annette L. Hurst hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendant Microsoft Corporation in the above-captioned actions.

I am a member in good standing of the Bar of the State of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been

convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

Dated: December 18, 2023

By: /s/ Annette L. Hurst

Annette L. Hurst
ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669
Telephone (415) 773-5700
ahurst@orrick.com

*Attorneys for Defendant
Microsoft Corporation*